SFM 05/06 and SFM 01/06 Part 2, Chapter 35 and Part 3, Article 89

Public comment from:

Barbara A. Schultheis Fire Marshal San Francisco Fire Department 698 2nd St. San Francisco, CA 94107

Requests that this section or reference provision be recommended: Approved as amended

Reference: 1. Chapter 35 of the Proposed California Building Code Amendments to the 2006 IBC.

2. Section 89.101.3.3.4 of the Proposed California Electrical Code Amendments to NFPA 70.

Honorable Commissioners:

I hereby petition the California Building Standards Commission (CBSC) to specifically adopt NFPA 76, Fire Protection for Telecommunication Facilities in Chapter 35 of the CBC.

Section 89.101.3.3.4 of the proposed amendments to the California Electrical Code removes telecommunication equipment from the scope of the NEC.

The definition of telecommunication equipment has changed in the 2005 NEC (NFPA 70) to include power equipment (e.g., d.c. converters, inverters, and batteries) and technical support equipment (e.g. computers).

At the same time as the definition change, NFPA created a new standard, NFPA 76, Standard for Fire Protection of Telecommunications Facilities.

I believe that the definition change and the new standard are not separate and unrelated. Not adopting NFPA 76 leaves compliance with any standard in telecommunication facilities in a precarious position, and could put first responders in harm's way.

Thank you,

Barbara A. Schultheis Fire Marshal San Francisco Fire Department 698 2nd St. San Francisco, CA 94107